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Application to adjourn the initial pretrial conference is GRANTED.
Decision on rescheduling the conference is REFERRED to the
magistrate judge assigned to this matter. SO ORDERED.

Date: October 24, 2024
New York, New York



Dale E. Ho
United States District Judge

October 23, 2024

VIA ECF

Hon. Dale E. Ho, U.S.D.J.
United States District Court, Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Courtroom 905
New York, New York 10007

Re: *Ahouva Steinberg v. Cushman & Wakefield, Inc., et al.*
Case No. 1:24-cv-06470
Certain Defendants' Letter Motion to Adjourn

Dear Judge Ho:

The undersigned counsel represents Defendants Cushman & Wakefield, Inc., Cushman & Wakefield 1, Inc., Cushman & Wakefield Capital Services, LLC (collectively, the “C&W Entities”), and Pinnacle Property Management Services, LLC (“PPMS”) in the above-referenced matter. Pursuant to Your Honor’s Individual Rules and Practices Paragraph 2(e), we write to respectfully request an adjournment of the Initial Conference, which is currently scheduled for October 31, 2024, and the accompanying deadlines as set forth in Federal Rule of Civil Procedure 26(f) and the Notice of Initial Pretrial Conference issued by this Court on August 29, 2024 (ECF No. 17).

PPMS and the C&W Entities request this adjournment because the deadline to answer, move, or otherwise respond to the Complaint is October 29, 2024, and anticipate filing a pleading other than an answer that will dispose of the Complaint against certain Defendants entirely. As a result, PPMS and the C&W Entities seek to adjourn the existing deadlines to initiate and meaningfully engage in the discovery process after their respective responses to the Complaint have been finalized and filed. Counsel for Defendants Cappelli Development, LLC, Cappelli Organization, LLC, and RFMCH Huguenot Property Owner, LLC (the “Cappelli Defendants”) consent to this request. Counsel for Plaintiff Ahouva Steinberg (“Plaintiff”) does not consent to this request as she does not believe the adjournment is necessary.

The following alternate conference dates are mutually agreeable to the C&W Entities, PPMS, the Cappelli Defendants, and Plaintiff: December 18, 2024, and December 19, 2024. Also, all Defendants are agreeable to proceed on December 23, 2024, and Plaintiff’s counsel of record might be able to attend an Initial Conference if set for December 23, 2024.

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This is the first request for an adjournment of the Initial Conference. The parties do not have another scheduled appearance before the Court.

Thank you for your consideration of our submission.

Respectfully submitted,

/s/ Johner T. Wilson III

Johner T. (J.T.) Wilson III